

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

**IN RE: VALSARTAN LOSARTAN,  
AND IRBESARTAN PRODUCTS  
LIABILITY LITIGATION**

**MDL No. 2875**

**Honorable Renée Marie Bumb,  
District Judge**

*This Documents Relates to All Actions*

**ZHP'S NOTICE OF OBJECTIONS TO  
AND MOTION TO REVERSE SPECIAL MASTER ORDER 98 GRANTING  
PLAINTIFFS' MOTION FOR RULE 37 SANCTIONS**

**PLEASE TAKE NOTICE** that on July 1, 2024, Defendant Zhejiang Huahai Pharmaceutical Co., Ltd. (“ZHP”), by and through its undersigned counsel, shall move for the entry of an Order vacating Special Master Order No. 98 (ECF 2715) and reversing the sanctions granted in that order. This objection and motion to vacate Special Master Order No. 98 is made to the Honorable Renée Marie Bumb, Chief United States District Judge, pursuant to Rule 53(f) of the Federal Rules of Civil Procedure and the applicable local rules of this Court.

**PLEASE TAKE FURTHER NOTICE** that in support of this motion, ZHP shall rely on the accompanying Memorandum of Law in Support of ZHP’s Motion to Reverse Special Master Order 98 Granting Plaintiffs’ Motion for Rule 37 Sanctions and the Certification of Jessica Davidson.

**PLEASE TAKE FURTHER NOTICE** that a proposed Order is submitted herewith; and

**PLEASE TAKE FURTHER NOTICE** that oral argument is requested, pursuant to Fed. R. Civ. P. 53(f)(1), if this motion is opposed.

**PLEASE TAKE FURTHER NOTICE** that a Certificate of Service attesting to the date and manner of service is submitted herewith.

Dated: May 31, 2024

Respectfully submitted,

By: /s/ Jessica Davidson  
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*Attorneys for Zhejiang Huahai  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on May 31, 2024, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to all CM/ECF participants in this matter.

/s/ Jessica Davidson  
Jessica Davidson